

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

United States of America

v.

No. 1:15-CR-00012-01-SM

Panos Eliopoulos

ASSENTED-TO MOTION TO CONTINUE

NOW COMES the Defendant, Panos Eliopoulos, by and through counsel, and moves this Honorable Court to continue Jury Selection and Trial in this matter for a period of 30 days, as the Court's docket permits. In support of this, it is alleged as follows:

1. The Defendant is charged with Conspiracy to Offer Drug Paraphernalia for Sale and Conspiracy to Commit Money Laundering.
2. This matter is scheduled for Jury Selection on September 15, 2015, at 9:30 a.m., with the Trial occurring during the two week period following Jury Selection.
3. The parties in this matter and in the companion case of USA v. Katie Eliopoulos reached a negotiated disposition on the day of the Pre-Trial Conference.
4. The parties require additional time to execute the appropriate plea agreement documentation which the Court was informed of at the Pre-Trial Conference.
5. Counsel for the Defendant has contacted Assistant United States Attorney Jennifer Davis who assents to the relief requested in this motion.
6. Counsel for the Defendant has contacted Jonathan Saxe, Esquire, counsel for the co-defendant, Katie Eliopoulos, who assents to the relief requested in this motion.
7. The Defendant will submit a Waiver of Speedy Trial following this motion.

WHEREFORE, the Defendant prays for the following relief:

- A. To continue Jury Selection/Trial for a period of 30 days, as the Court's docket permits;
- B. For such other relief the Court deems equitable and just.

Respectfully submitted,

Panos Eliopoulos
By his attorneys,

WILSON, BUSH, DURKIN & KEEFE

Dated: September 14, 2015

/s/ Charles J. Keefe
Charles J. Keefe
184 Main Street, Suite 222
Nashua, New Hampshire 03060
(603) 595-0007
NH Bar No.: 14209
keefe@wbdklaw.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Assented-to Motion to Continue was this date forwarded to Jennifer Davis, Esquire, Assistant U.S. Attorney, and to Jonathan Saxe, Esquire.

Dated: September 14, 2015

/s/ Charles J. Keefe
Charles J. Keefe

ERROR: undefined
OFFENDING COMMAND:

STACK: